

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
NOV 5 2020
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACKIE MATTHEWS,

Defendant.

4:20CR00699 RLW/NAB

INDICTMENT

General Allegations

The Grand Jury charges that:

At all times relevant to this Indictment:

1. The Ferguson Police Department ("FPD") was a law enforcement agency in the Eastern District of Missouri;
2. Among other functions, the FPD was responsible for investigating crimes occurring in Ferguson, Missouri;
3. Members of the FPD also assisted other municipal police departments located in and around St. Louis County on an "as needed" basis;
4. Defendant JACKIE MATTHEWS was employed by the FPD as a police officer;
5. Defendant JACKIE MATTHEWS was sworn to uphold the United States Constitution, as well as the laws of the State of Missouri.

COUNT ONE
[18 U.S.C. §242]

6. Paragraphs 1-5 of the General Allegations are incorporated by reference in this count.

7. On or about March 13, 2020, within the Eastern District of Missouri, the defendant,

JACKIE MATTHEWS,

while acting under color of law, willfully deprived G.R. of the right to be free from unreasonable seizure, a right secured and protected by the Constitution and laws of the United States, which right includes the right to be free from the use of unreasonable force. In so doing, the defendant assaulted G.R. while G.R. was handcuffed and not posing a physical threat to anyone. This offense resulted in bodily injury to G.R.

In violation of and punishable under Title 18, United States Code, Section 242.

COUNT TWO
[18 U.S.C. §1519]

The Grand Jury further charges that:

8. Paragraphs 1-5 of the General Allegations are incorporated by reference in this count.

9. On or about March 13, 2020, within the Eastern District of Missouri, the defendant,

JACKIE MATTHEWS,

knowingly made a false entry in a record and document with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of any

department or agency of the United States.

In violation of and punishable under Title 18, United States Code, Section 1519.

A TRUE BILL.

FOREPERSON

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